

The Federal Trade Commission (“FTC”) has reviewed the additional documents and responses produced by Jason Ellsworth (“Ellsworth”). Where the FTC has identified deficiencies, Ellsworth has worked to rectify them promptly. There are certain requests, including Requests 3 and 9 and portions of Requests 11

and 13, for which Ellsworth contends there are no responsive documents.

Ellsworth has agreed to provide some of the information for Request 13, including the position, role, and responsibilities of employees, in the form of an interrogatory upon request by the FTC. Ellsworth maintains that he has conducted an exhaustive search and has certified to the FTC that he has produced all documents in his possession, custody, control, or within his knowledge. Therefore, the FTC stipulates that Ellsworth has complied with all of the FTC's requests as required by this Court's June 18, 2014 Order.

Dated: July 3, 2014

Respectfully Submitted,

/s/ Megan Bartley

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CERTIFICATE OF SERVICE

I, Megan Bartley, certify that on July 3, 2014, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System, which will send notification of such filing to:

Hank Waters (hanktwaters@hankwaters.com)

/s/ Megan A. Bartley

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